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Attorneys for Dr. Yorai Benzeevi and  
HealthCare Conglomerate Associates, LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF TULARE, VISALIA DIVISION

In re SEARCH WARRANT NO. 013487  
EXECUTED AUGUST 22, 2018 AT  
JPMORGAN CHASE BANKYORAI  
BENZEEVI,

Moving Party,

v.

SUPERIOR COURT OF THE COUNTY  
OF TULARE

Respondent,

TULARE COUNTY DISTRICT  
ATTORNEY'S OFFICE,

Real Party in Interest.

Case No.  
  
**[PROPOSED] SEALING ORDER AND  
PROTECTIVE ORDER**  
  
Date: October 5, 2018  
Time: 2:00 p.m.  
Dept.: 13  
Judge: Hon. John P. Bianco

**RECEIVED**  
TULARE COUNTY SUPERIOR COURT  
ADMINISTRATION  
  
**OCT 03 2018**  
  
STEPHANIE CAMERON, CLERK  
BY: LA

1 The motion of Moving Party Yorai Benzeevi's Motion to seal the Reply of Dr. Yorai  
2 Benzeevi in Support of Motion for Return of Seized Property and Relating Evidentiary Hearing,  
3 came before this Court on October 5, 2018 at 2:00 p.m.

4 After considering the moving papers and all other matters presented to the Court, the  
5 Court hereby finds that the facts presented to the Court establish that the required elements of  
6 Rule 2.550 and 2.551 of the California Rules of Court have been met. Specifically, the Court  
7 finds that, with respect to the foregoing documents, Dr. Benzeevi has shown:

- 8 a) An overriding interest that overcomes the right of public access to the record;
- 9 b) that overriding interest supports sealing the record;
- 10 c) A substantial probability exists that the overriding interest will be prejudiced if the  
11 record is not sealed;
- 12 d) The proposed sealing is narrowly tailored; and
- 13 e) No less restrictive means exist to achieve the overriding interest.

14 Moreover, Dr. Benzeevi has established good cause that a protective order is needed to  
15 prohibit dissemination of private and corporate financial information. As such, the redacted  
16 information included in Dr. Benzeevi's Reply may not be shared outside of parties in this action.  
17 This protective order is not exclusive to other, additional protective orders that may be sought in  
18 this action at a future date.

19 Good cause having been established, IT IS HEREBY ORDERED that Dr. Benzeevi's  
20 Motion to Seal and for a Protective Order is GRANTED. Portions of the Reply in support of Dr.  
21 Benzeevi's Motion for Return of Seized Property and Related Evidentiary Hearing shall be sealed  
22 and protected from public disclosure. This Order is not to be sealed. This order does not operate  
23 to seal any other court records relating to this case. Only this Court and the parties to this case are  
24 authorized to inspect the sealed records.

25 **IT IS SO ORDERED.**

26 Dated: \_\_\_\_\_, 2018

27 By: \_\_\_\_\_  
28 Honorable John P. Bianco  
Judge of the Superior Court